

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	Bankr. No. 15-24752 CMB
JEWEL J. OUTLAW,	)	
	)	Chapter 13
Debtor.	)	
	)	Docket No. 63
JEWEL J. OUTLAW,	)	Related to Docket No.
	)	
Movant,	)	Hearing Date & Time:
	)	
vs.	)	Claim No. 15
	)	
PNC BANK, N.A. AND	)	
RONDA J. WINNECOUR,	)	
CHAPTER 13 TRUSTEE,	)	
	)	
Respondents.	)	

**DECLARATION OF MORTGAGE PAYMENT CHANGE**

And Now, comes the Debtor, Jewel J. Outlaw, by and through her attorney, who respectfully represents the following:

1. On or about December 31, 2015, Debtor filed for protection under Chapter 13 of the U.S. Bankruptcy Code.
2. An Amended Chapter 13 Plan dated July 1, 2016 was previously confirmed on a final basis that listed a monthly mortgage payment amount of \$610.24, then \$597.23 effective 1/1/2016 as was listed in PNC's proof of claim.
3. PNC Bank filed a Notice of Mortgage Payment Change effective December 1, 2016 with a new mortgage payment amount of \$621.77. A Declaration of Mortgage Payment Change was filed reflecting this adjustment.
4. PNC Bank filed a Notice of Mortgage Payment Change effective 1/1/2017. No Declaration of Mortgage Payment change was filed for this change. The amount was decreased from the \$621.77 to \$613.16 effective on 1/1/2017 or with the December 2016 distribution.

WHEREFORE, the Debtor requests that the Chapter 13 Trustee make the necessary adjustments to reflect the previous mortgage payment change, but will make the 12/1/2017 payment change of \$617.05 that is listed on the declaration of mortgage payment that was filed on November 7, 2017.

Date: 11/27/2017

Respectfully submitted.  
/s/ Rodney D. Shepherd  
Rodney D. Shepherd, Esquire  
Attorney for the Debtor  
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### **CERTIFICATE OF SERVICE**

I, Rodney D. Shepherd, attorney for the debtor, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 27<sup>th</sup> day of November, 2017, by Electronic Filing and U.S. Mail, first class, postage pre-paid, upon the following:

Ronda J. Winnecour, Esquire  
Chapter 13 Trustee  
[cmecf@chapter13trusteewdpa.com](mailto:cmecf@chapter13trusteewdpa.com)

KML Law Group  
Attn: James Warmbrodt, Esquire  
bkgroup@kmlawgroup.com

By: /s/ Rodney D. Shepherd  
Rodney D. Shepherd  
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